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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAI'I

R.P.-K., through his parent C.K.,  
R.T.D., through his parents R.D. and  
M.D., and the HAWAI'I DISABILITY  
RIGHTS CENTER, in a representative  
capacity on behalf of its clients and all  
others similarly situated,

Plaintiffs,

vs.

DEPARTMENT OF EDUCATION,  
State of Hawai'i,

Defendant.

CIVIL NO. 10-00436 DAE-KSC  
(Class Action)

**PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION;  
MEMORANDUM IN SUPPORT OF  
MOTION; APPENDICES 1-2;  
DECLARATION OF JOHN P.  
DELLERA, EXHIBITS A-H;  
DECLARATION OF J.K.,  
EXHIBITS I-J; DECLARATION OF  
N.W., EXHIBITS K-L;  
DECLARATION OF A.K.,  
EXHIBITS M-N, DECLARATION  
OF B.C., EXHIBITS O-P;**

**DECLARATION OF S.T.,  
EXHIBITS Q-R; DECLARATION  
OF L.D., EXHIBITS S-T;  
DECLARATION OF ROY M.  
BENAVIDEZ, EXHIBIT U;  
CERTIFICATE OF SERVICE**

061101.11

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs, through their undersigned attorneys, hereby move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a preliminary injunction requiring the DOE to continue to provide educational and related services until the conclusion of this action to K.K., M.W., A.C.K., K.C., A.D., and **M.L. and to all other members of the Plaintiff class who have qualified for Extended School Year services.**

This motion is based upon the attached memorandum, declarations, and exhibits and upon such further evidence and argument as may be presented prior to or during a hearing on this motion.

DATED: Honolulu, Hawai'i, June 23, 2011.

/s/ John P. Deller  
JOHN P. DELLERA  
MATTHEW C. BASSETT  
ROY BENAVIDEZ  
PAUL ALSTON  
JASON H. KIM

Attorneys for Plaintiffs